

Schweet Linde & Rosenblum, PLLC  
575 S. Michigan St.  
Seattle, WA 98108  
P: (206) 275-1010  
F: (206) 381-0101

Honorable Judge Marc Barreca  
Chapter 7  
Everett Station Calendar  
Hearing Date: November 22, 2023  
Hearing Time: 10:00 a.m.  
Response Due: November 15, 2023

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

TIMOTHY DONALD EYMAN

Debtor(s).

Case No.: 18-14536-MLB

**FINAL APPLICATION FOR  
COMPENSATION AND  
REIMBURSEMENT OF EXPENSES BY  
SCHWEET LINDE & ROSENBLUM,  
PLLC, COUNSEL FOR CHAPTER 7  
TRUSTEE**

**MOTION AND APPLICATION**

Schweet Linde & Rosenblum, PLLC ("SLR"), counsel for Virginia Burdette, the Chapter 7 Trustee of the Bankruptcy Estate of Timothy D. Eyman, ("Trustee"), respectfully submits its final application for compensation and reimbursement of expenses incurred in the representation of the Trustee in the above captioned Chapter 7 main case.

SLR is seeking approval of fees in the amount of \$12,622.50 and costs in the amount of \$188.00, which covers the time period December 15, 2022 through May 31, 2023. This application is supported by the records and files herein, and the declaration of Thomas S. Linde, attached below.

11 U.S.C. § 330, entitled Compensation of Officers, governs the requirements for awarding fees to a professional person employed under 11 U.S.C. §327. After notice and a hearing, the Court may award "reasonable compensation for actual, necessary services rendered" and "reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). In determining the amount

1 of reasonable compensation to be awarded, the Court must consider the nature, the extent, and the  
2 value of such services, taking into account all relevant factors, including—

- 3 (A) the time spent on such services;  
4 (B) the rates charged for such services;  
5 (C) whether the services were necessary to the administration of, or beneficial at  
6 the time at which the service was rendered toward the completion of, a case under  
7 this title;  
8 (D) whether the services were performed within a reasonable amount of time  
9 commensurate with the complexity, importance, and nature of the problem, issue,  
10 or task addressed;  
11 (E) with respect to a professional person, whether the person is board certified or  
12 otherwise has demonstrated skill and experience in the bankruptcy field; and  
13 (F) whether the compensation is reasonable based on the customary compensation  
14 charged by comparably skilled practitioners in cases other than cases under this  
15 title.

11 11 U.S.C. § 330(a)(3). In determining the reasonable amount of attorney's fees to be  
12 awarded, courts use the lodestar analysis. A lodestar approach calculates a reasonable attorney fee  
13 by multiplying the number of hours reasonably expended on the litigation by a reasonable hourly  
14 rate. *Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 546, 130 S. Ct. 1662, 1669 (2010). This  
15 calculation results in a “presumptively reasonable” fee award. *Morales v. City of San Rafael*, 96  
16 F.3d 359, 363-64 (9th Cir. 1996). The applicant bears the burden of proof to establish that its  
17 hourly rate and hours expended are reasonable. *Hensley v. Eckerhart*, 461 U.S. 424, 437, 103 S.  
18 Ct. 1933, 1941 (1983).

19 The services provided by SLR were necessary to the administration of this case and  
20 beneficial at the time they were rendered. The rates charged by SLR are at or below the market  
21 rate for attorneys of similar skill and experience. SLR incurred a total of \$12,622.50 (31.65 hours)  
22 in this matter, which is being billed to the estate.

23 The time spent by SLR on this matter was reasonable given the legal issues requiring  
24 attention, the duration of the application period (three months), and the results obtained. Pursuant  
25 to the lodestar analysis, the fees requested by SLR are “presumptively reasonable,” and SLR  
26

1 believes they are also reasonable in-fact. Likewise, the costs requested were actual and necessary  
2 expenses of the estate.

3 For these reasons, SLR respectfully requests the Court approve the application and enter  
4 an order approving SLR's request for compensation and reimbursement of expenses.

5 DATED: October 16, 2023.

6 **SCHWEET LINDE & ROSENBLUM, PLLC**

7 /s/ Thomas S. Linde

8 Thomas S. Linde, WSBA #14426

9 Michael M. Sperry, WSBA #43760

10 Conner W. Morgan, WSBA #55697

11 Attorneys for Virginia Burdette, Chapter 7 Trustee

**DECLARATION OF COUNSEL**

1  
2 1. I am one of the attorneys representing the Trustee in this matter. I am a custodian of the  
3 billing statements documenting the fees and costs incurred in connection with this matter.  
4 I have personal knowledge of the facts contained herein and am competent to testify  
5 thereto. This declaration is made pursuant to Local Bankr. R. 2016-1.

6 2. **Order Authorizing Employment:** The Court entered the Order Authorizing Employment  
7 of General Counsel for the Trustee, which approved SLR's employment, on December 22,  
8 2021, at Dkt. 422.

9 3. **Prior Compensation:** This interim application for compensation and reimbursement of  
10 expenses is the second such application filed by SLR in this matter. This court previously  
11 approved SLR's first fee application on September 22, 2022 (ECF no. 490) and SLR  
12 received fees in the amount of \$163,727.50 in fees and \$7,272.44 in expenses as a result.  
13 In addition, this court approved SLR's second fee application on January 23, 2023 (ECF  
14 no. 513) and SLR received fees in the amount of \$13,195.50 in fees and \$25.50 in expenses  
15 as a result.

16 4. **Source of Payment:** SLR requests payment from the unencumbered finds in the  
17 bankruptcy estate ("Estate").

18 5. **Unencumbered Funds:** There are \$325,524.01 in unencumbered funds in the estate.

19 6. **Other Professionals:** The Estate has employed the following other professionals in this  
20 case: Kary Krismer, as Realtor employed by the Trustee pursuant to an order dated  
21 February 10, 2022 (Dkt. 437), and Richard Ginnis as Accountant for the Trustee pursuant  
22 to an order dated April 6, 2022 (Dkt. 454).

23 7. **Relevant History and Issues of the Case:**

24 The Debtor's case was filed as an individual Chapter 11 bankruptcy on November  
25 28, 2018 (Dkt. 1). A Chapter 11 Plan was confirmed on April 8, 2020 (Dkt. 274.) The  
26 Debtor stipulated that the debt owed to the State of Washington was non-dischargeable

1 (Dkt. 297). On July 29, 2020, the Chapter 11 case administratively closed without  
2 discharge. Following default on the Chapter 11 plan in 2021, the State of Washington  
3 moved to convert the Debtor's case to Chapter 7 (Dkt. 392). This Court entered the Order  
4 Granting Motion to Convert Case from Chapter 11 to 7 on December 17, 2021 (Dkt. 408),  
5 and appointed Trustee Burdette on the same day (Dkt. 409). SLR was employed by the  
6 Trustee as her counsel upon the Trustee's appointment following conversion, with SLR's  
7 employment formally approved on December 22, 2021 (Dkt. 422).

8 Prior to conversion, an adversary proceeding had been filed by the State of  
9 Washington under cause number 21-01041, seeking a determination that certain real  
10 property disclosed in Debtor's schedules and confirmed Chapter 11 Plan, an unencumbered  
11 home in Mukilteo, Washington, was the property of the bankruptcy Estate, and subject to  
12 administration by the Trustee. The State had further sought a determination that the  
13 recording of certain fee awards in favor of attorneys for the Debtor had been made in  
14 violation of the bankruptcy stay and were therefore void. Debtor's now former wife, Karen  
15 Eyman n/k/a Karen Williams, had intervened in the adversary proceeding, asserting that  
16 she had a separate property interest in the property. The Trustee, through SLR, obtained  
17 an order permitting the Trustee to intervene in the adversary proceeding, and participate in  
18 this Court addressing the summary judgment filed by the State. This Court ultimately ruled  
19 the property was at least 80% community property, and deferred ruling as to the character  
20 of the other 20% interest. (AP Dkt. 68).

21 After the summary judgment ruling, the Trustee, the State, Tim Eyman, Karen  
22 Williams, and Goodstein Law Group entered mediation through the Thomas T. Glover  
23 Mediation Program. That mediation ultimately resulted in an agreement whereby the  
24 Trustee could administer the real property with the agreement of parties, avoiding litigation  
25 that could have caused the administration to be drawn out or unsuccessful. The settlement  
26

1 was ultimately approved by this Court (Dkt. 483) and the real property was administered  
2 netting the estate \$889,693.52 (Dkt. 485).

3 Following payment of SLR's first interim fee application, the Adversary  
4 Proceeding closed. SLR identified two assets of the Estate that warranted pursuit, namely  
5 1) non-exempt funds of the debtor on deposit on the date of conversion, and 2) the non-  
6 exempt right to collect on a \$411,000.00 debt owed to the Debtor.

7 Recovery of the funds on deposit initially proceeded via negotiation toward a  
8 payment-over-time turnover agreement, to be secured by a lien on the Debtor's vehicle.  
9 Ultimately, however, the debtor rendered the entire amount due to the Trustee in a lump  
10 sum payment in the amount of \$21,407.90.

11 At his 341 meetings, the Debtor testified under oath that he loaned the sum of  
12 \$500,000.00 to a PAC that he variously refers to as "Voters Want More Choices" and  
13 "Permanent Offense." Publicly available records corroborate that a loan was made by the  
14 Debtor to the PAC registered as Permanent Offense in 2018. Permanent Offense made  
15 payments on that loan to the debtor at various times during the pendency of the Chapter  
16 11, totaling \$89,000.00, according to financial reports filed in the Chapter 11, which  
17 coincide with reports filed by the PAC with the Public Disclosure Commission of  
18 Washington.

19 SLR sent a demand letter to the PAC leadership identified in the organization's  
20 PDC filings. The PAC hired counsel, who prepared a response to the demand. In response  
21 to certain legal and factual issues raised by this response, SLR performed additional  
22 research on the laws governing PACs, and into the publicly available filings of the PAC in  
23 question. Based on this research, SLR recommended that the Trustee abandon pursuit of  
24 the PAC. Additionally, based on the analysis provided in the Motion to Abandon (Dkt.  
25 517).  
26

8. **Summary of Services Provided during Period Covered by Application**<sup>1</sup>

Category	Time	Expense	Total
Prior Fee Application	\$3,442.50	\$0.00	\$3,442.50
Work on Remaining Estate Assets	\$6,730.00	\$188.00	\$6,918.00
Court of Appeals Case Conclusion	\$360.00	\$0.00	\$360.00
Case Admin	\$1,215.00	\$0.00	\$1,215.00
Third Fee Application	\$875.00	\$0.00	\$875.00
<b>Total Fees Incurred</b>	\$12,622.50		
<b>Total Expenses</b>		\$188.00	
<b>Fees and Expenses Due</b>			<b>\$12,810.50</b>

A. **Second Interim Fee Application:** After December 15, 2022, SLR attorneys and staff continued efforts to review, finalize and file the second fee application. Due to the length of time and breadth of issues covered by the period in question, significant staff and attorney time was required to prepare the second fee application in the detail necessary. Fees associated with working on the Second Interim Fee Application total \$3,442.50. Expenses of \$0.00 are associated with this category. An itemized recitation of fees in this category is attached hereto as **Exhibit A**.

B. **Work on Remaining Estate Assets:** This category includes investigation of assets and research on legal issues related to Estate assets. This includes work associated with the non-exempt financial assets in possession of the debtor on the date of filing, and with evaluating and pursuing the \$411,000.00 owed to the debtor as a result of a loan he made to a political action committee prior to his Chapter 11 filing in 2018. This category also includes the legal research conducted regarding potential pursuit of the Debtor's websites and campaign lists, and communications with the Debtor's attorneys regarding the same. Finally, this category includes work in obtaining an order of abandonment. Fees associated with working on the remaining estate assets total \$6,730.00, and expenses in the amount

<sup>1</sup> SLR has endeavored to allocate each time entry to the most appropriate time category. Certain entries contain more than one type of entry, or could appropriately be characterized under more than one category.

1 of \$188.00. No expenses are associated with this category. An itemized recitation of fees  
2 in this category is attached hereto as **Exhibit B**.

3 **C. Court of Appeals:** This category includes work necessary to monitor and provide advice  
4 to the Trustee related to the ongoing appellate litigation between the Debtor and the State  
5 of Washington and the impact that said litigation had on the State of Washington's proof  
6 of claim in this above-captioned bankruptcy case. Fees associated with this total \$360.00.  
7 No expenses are associated with this category. An itemized recitation of fees in this  
8 category is attached hereto as **Exhibit C**.

9 **D. Case Administration:** This category includes communications with client and parties  
10 about general case matters, and review of legal rulings associated with the debtor. It also  
11 communications with the Trustee regarding the same and regarding the balance if the  
12 Estate's account. Fees associated with case administration total \$1,215.00. No expenses  
13 are associated with this category. An itemized recitation of fees in this category is attached  
14 hereto as **Exhibit D**.

15 **E. Third Fee Application:** This category includes communications and work necessary to  
16 draft and revise this Application and the related documents. Fees associated with case  
17 administration total \$875.00, which is less than the actual amount of fees incurred to draft  
18 and revise this Application. When combined with the \$11,747.50 in fees described in  
19 categories 8.A through 8.D, the total amount of fees incurred during the Application Period  
20 totals \$12,622.50. No expenses are associated with this category.

21 **9. Itemized Time Record of Services and Expenses:** Between December 15, 2022, and May  
22 31, 2023, (the "Application Period"), SLR performed substantial work on behalf of the  
23 Trustee and the bankruptcy estate. Attached and incorporated herein as **Exhibits A-D** are  
24 true and correct copies of SLR's itemized time record of services for which this award of  
25 compensation is sought, broken down by categories consistent with those described in  
26 section 8, above. Time records have been redacted to remove work product or attorney-  
client privileged information. **Inclusion of unredacted attorney-client privileged or**



**work product information does not constitute waiver of such privilege and is intended only to assist the Court in reviewing this fee application.**

10. No further assets are expected to be recovered after the Trustee obtained an Order Abandoning Property of the Estate, other than the cash asset in the estate's bank account. (Dkt. 522)

11. The persons that may be referenced in the records and the hourly rate of each person are summarized in the chart below:

Name	Position	Hourly Rate
Thomas S. Linde	Partner	\$450
Michael M. Sperry	Partner	\$450
Latife H. Neu	Of Counsel	\$450
Conner W. Morgan	Associate	\$350
Karen L. Linde	Paralegal	\$150
Ali A. Small	Paralegal	\$150

12. SLR has spent a total of 32.35 hours of time on the case during the period covered by this Application, of which 31.65 hours are being billed to the estate. The total amount of fee compensation for which approval is requested is \$12,622.50.

13. **Reimbursement of Expenses:** SLR seeks reimbursement of expenses in the amount of \$188.00.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

1 **14. Services Remaining to be Rendered:** Following the entry of an order related to this

2 Application, SLR anticipates that its services will no longer be necessary given that the  
3 Trustee has abandoned pursuit of the Debtor's remaining non-exempt assets. See Order  
4 Abandoning Property or the Estate. (Dkt. 522).

5 **I declare under the penalty of perjury under the laws of the State of Washington that**  
6 **the foregoing is true and correct.**

7 Signed and dated this 16<sup>th</sup> day of October, 2023 at Seattle, Washington.

8  
9 /s/ Thomas S. Linde

10 Thomas S. Linde, WSBA #14426  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

6/21/2023

## Exhibit A, Page 2 of 3

6/21/2023

Schweet Linde &amp; Rosenblum, PLLC

9:19 AM

Slip Listing

Page 2

Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
548079	Latife	0.50	450.00	225.00
12/21/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023 BurdetteVirgina.Eyman			
Communication with client [REDACTED]				
[REDACTED]	Finalize			
[REDACTED] motion, Proposed order, and Exhibits to [REDACTED]				
[REDACTED]				
548091	Tom	0.10	450.00	45.00
12/21/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023 BurdetteVirgina.Eyman			
Conference with L. Neu regarding [REDACTED]				
[REDACTED]				
548100	Tom	0.75	450.00	337.50
12/21/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023 BurdetteVirgina.Eyman			
Continue review and revision to pleadings in support of second application for approval of fees and costs				
548102	Tom	0.20	450.00	90.00
12/21/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023 BurdetteVirgina.Eyman			
Conference with Latife Neu regarding [REDACTED]				
[REDACTED]				
[REDACTED]				
548222	Michael	0.30	450.00	135.00
12/22/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023 BurdetteVirgina.Eyman			
Review of draft motion for interim disbursement, and email to trustee regarding [REDACTED]				
[REDACTED]				
548243	Latife	0.50	450.00	225.00
12/22/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023 BurdetteVirgina.Eyman			
Communication w office of client regarding [REDACTED]				
[REDACTED]				
[REDACTED]				
548257	Tom	0.60	450.00	270.00
12/22/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023 BurdetteVirgina.Eyman			
Review additional pleadings prepared by Chapter 7 trustee in support of applications to pay various administrative expenses				

## Exhibit A, Page 3 of 3

6/21/2023  
9:19 AM

Schweet Linde & Rosenblum, PLLC  
Slip Listing

Page 3

Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status		Activity	DNB Time	Rate Info	
Description		Client Reference		Bill Status	
548261	TIME	Tom	0.20	450.00	90.00
12/22/2022		Time	0.00	T	
Billed	G:20143868	1/5/2023	BurdetteVirgina.Eyman		
Conference with L. Neu regarding [REDACTED]					
548382	TIME	Ali	0.20	150.00	30.00
12/27/2022		Time	0.00	T	
Billed	G:20143868	1/5/2023	BurdetteVirgina.Eyman		
Calendar upcoming required hearing dates and responsive deadlines for attorney					
550702	TIME	Karen	0.40	150.00	60.00
1/19/2023		Time	0.00	T	
Billed	G:20144494	2/6/2023	BurdetteVirgina.Eyman		
Advise bankruptcy court of no objections; Upload Order regarding same					
Grand Total					
		Billable	8.05		3442.50
		Unbillable	0.00		0.00
		Total	8.05		3442.50

6/21/2023

## Exhibit B, Page 2 of 5

6/21/2023  
9:15 AMSchweet Linde & Rosenblum, PLLC  
Slip Listing

Page 2

Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
548370	Tom	0.30	450.00	135.00
12/23/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023			
Conference with Michael Sperry regarding [REDACTED]	BurdetteVirginia.Eyman			
549078	Conner	1.40	350.00	490.00
12/23/2022	Time	0.00	T	
Billed	G:20143868 1/5/2023			
Continue legal research regarding [REDACTED]	BurdetteVirginia.Eyman			
549330	Tom	0.15	450.00	67.50
1/3/2023	Time	0.00	T	
Billed	G:20144494 2/6/2023			
Review emails from Virginia Burdette and L. Neu regarding [REDACTED]	BurdetteVirginia.Eyman			
549529	Latife	0.40	450.00	180.00
1/3/2023	Time	0.00	T	
Billed	G:20144494 2/6/2023			
Prepare communication [REDACTED]	BurdetteVirginia.Eyman			
550033	Conner	0.60	350.00	210.00
1/10/2023	Time	0.00	T	
Billed	G:20144494 2/6/2023			
Conference with T. Linde and M. Sperry regarding [REDACTED]	BurdetteVirginia.Eyman			
[REDACTED] emails to and from T. Linde and M. Sperry regarding [REDACTED]				
550043	Tom	0.40	450.00	180.00
1/10/2023	Time	0.00	T	
Billed	G:20144494 2/6/2023			
Conference with M. Sperry and C. Morgan regarding [REDACTED]	BurdetteVirginia.Eyman			
551244	Conner	0.10	350.00	35.00
1/25/2023	Time	0.00	T	
Billed	G:20144494 2/6/2023			
Telephone call with M. Sperry regarding [REDACTED]	BurdetteVirginia.Eyman			

## Exhibit B, Page 3 of 5

6/21/2023  
9:15 AMSchweet Linde & Rosenblum, PLLC  
Slip Listing

Page 3

Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
	Posting Status	Activity	DNB Time	Rate Info	
	Description	Client Reference		Bill Status	
551487	TIME	Conner	0.80	350.00	280.00
1/26/2023	2:54 PM	Time	0.00	T	
Billed	G:20144494	2/6/2023 BurdetteVirginia.Eyman			
Continue legal research regarding [REDACTED]					
[REDACTED]					
emails to and from T. Linde and M. Sperry regarding [REDACTED]					
[REDACTED]					
552081	TIME	Conner	0.50	350.00	175.00
1/27/2023		Time	0.00	T	
Billed	G:20144494	2/6/2023 BurdetteVirginia.Eyman			
Conference with M. Sperry regarding [REDACTED]					
[REDACTED]					
[REDACTED]					
552077	TIME	Conner	0.10	350.00	35.00
1/31/2023		Time	0.00	T	
Billed	G:20144494	2/6/2023 BurdetteVirginia.Eyman			
Conference with M. Sperry regarding [REDACTED]					
[REDACTED]					
553457	TIME	Conner	4.10	350.00	1435.00
2/10/2023	12:50 PM	Time	0.00	T	
Billed	G:20145162	3/6/2023 BurdetteVirginia.Eyman			
Draft e-memo to T. Linde and M. Sperry regarding [REDACTED]					
[REDACTED]; Conduct related					
legal research [REDACTED]					
553952	TIME	Tom	0.30	450.00	135.00
2/15/2023		Time	0.00	T	
Billed	G:20145162	3/6/2023 BurdetteVirginia.Eyman			
Conference with M. Sperry regarding [REDACTED]					
[REDACTED]					
554050	TIME	Tom	0.40	450.00	180.00
2/16/2023		Time	0.00	T	
Billed	G:20145162	3/6/2023 BurdetteVirginia.Eyman			
Conference with Virginia Burdette and M. Sperry regarding [REDACTED]					
[REDACTED]					
555565	TIME	Tom	0.25	450.00	112.50
2/28/2023		Time	0.00	T	
Billed	G:20145162	3/6/2023 BurdetteVirginia.Eyman			



## Exhibit B, Page 4 of 5

6/21/2023  
9:15 AMSchweet Linde & Rosenblum, PLLC  
Slip Listing

Page 4

Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
	Posting Status	Activity	DNB Time	Rate Info	
	Description	Client		Bill Status	
		Reference			
	Conference with Michael Sperry regarding [REDACTED]				
	[REDACTED]				
555564	TIME	Tom	0.20	450.00	90.00
3/1/2023		Time	0.00	T	
Billed	G:20145824	4/6/2023 BurdetteVirginia.Eyman			
	Review draft letter to debtor's counsel regarding remaining assets of estate				
555570	TIME	Michael	0.40	450.00	180.00
3/1/2023		Time	0.00	T	
Billed	G:20145824	4/6/2023 BurdetteVirginia.Eyman			
	Draft letter to debtor's attorney regarding possible purchase of website from estate (.4) [REDACTED] email to client [REDACTED] (no charge).				
555753	TIME	Michael	0.20	450.00	90.00
3/3/2023		Time	0.00	T	
Billed	G:20145824	4/6/2023 BurdetteVirginia.Eyman			
	Finalize letter to debtor's attorney regarding potential sale of website, and coordinate transmission of same.				
563054	TIME	Michael	1.10	450.00	495.00
5/1/2023		Time	0.00	T	
Billed	G:20147220	6/6/2023 BurdetteVirginia.Eyman			
	Begin work on drafting motion to abandon and related documents.				
563300	TIME	Michael	0.70	450.00	315.00
5/2/2023		Time	0.00	T	
Billed	G:20147220	6/6/2023 BurdetteVirginia.Eyman			
	Complete initial draft of motion to abandon, [REDACTED] email to client [REDACTED]				
563336	TIME	Michael	0.70	450.00	315.00
5/3/2023		Time	0.00	T	
Billed	G:20147220	6/6/2023 BurdetteVirginia.Eyman			
	Finalize motion to abandon remaining assets and related documents.				
563361	TIME	Karen	0.50	150.00	75.00
5/3/2023		Time	0.00	T	
Billed	G:20147220	6/6/2023 BurdetteVirginia.Eyman			
	Prepared Mailing of Notice of Motion for Authorization to Abandon Property; Send notices by regular mail to mailing matrix in the case				

# Exhibit B, Page 5 of 5

6/21/2023  
9:15 AM

Schweet Linde & Rosenblum, PLLC  
Slip Listing

Page 5

Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
565060	Michael	0.20	450.00	90.00
5/18/2023	Time	0.20	T	
Billed	BurdetteVirginia.Eyman		No Charge	
G:20147220 6/6/2023				
Revise proposed order to final order, and file same with court after striking hearing on motion to abandon.				
566077	Michael	0.20	450.00	90.00
5/26/2023	Time	0.00	T	
Billed	BurdetteVirginia.Eyman			
G:20147220 6/6/2023				
Review of status of case after abandonment order, email to client				
Grand Total	Billable	17.60		6730.00
	Unbillable	0.20		90.00
	Total	17.80		6820.00

# Exhibit C, Page 1 of 2

6/21/2023  
10:07 AM

Schweet Linde & Rosenblum, PLLC  
Slip Listing

Page 1

## Selection Criteria

Slip.Selection Include: 548948; 550199; 550200; 556007; 566082; 566368  
Slip.Classification Open

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
548948	TIME			Michael	0.10	450.00	45.00
	12/30/2022			Time	0.00	T	
	Billed	G:20143868	1/5/2023	BurdetteVirgina.Eyman			
			Email to State regarding claim adjustments from GLG and requesting the State address its claim given COA opinion altering judgment underlying State's claim.				
550199	TIME			Tom	0.20	450.00	90.00
	1/12/2023			Time	0.00	T	
	Billed	G:20144494	2/6/2023	BurdetteVirgina.Eyman			
			Review email from Susan Edison regarding status of proof of claim in light of recent ruling of Court of Appeals				
550200	TIME			Tom	0.10	450.00	45.00
	1/12/2023			Time	0.00	T	
	Billed	G:20144494	2/6/2023	BurdetteVirgina.Eyman			
			Email to Michael Sperry and L. Neu regarding [REDACTED]				
556007	TIME			Michael	0.20	450.00	90.00
	3/6/2023			Time	0.20	T	
	Billed	G:20145824	4/6/2023	BurdetteVirgina.Eyman		No Charge	
			Review of order denying Eyman's request for reconsideration at Div II COA, [REDACTED] email to client [REDACTED]				
566082	TIME			Michael	0.10	450.00	45.00
	5/26/2023			Time	0.00	T	
	Billed	G:20147220	6/6/2023	BurdetteVirgina.Eyman			
			Email to State regarding checking to see if claim needs to be amended.				
566368	TIME			Michael	0.30	450.00	135.00
	5/30/2023			Time	0.00	T	
	Billed	G:20147220	6/6/2023	BurdetteVirgina.Eyman			
			Call from the State regarding status of final payments and possible need to amend proof of claim. (.2) email to client [REDACTED] (.1)				

6/21/2023  
10:07 AM

Schweet Linde & Rosenblum, PLLC  
Slip Listing

Page 2

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
Grand Total	Billable	0.80		360.00
	Unbillable	0.20		90.00
	Total	1.00		450.00

6/21/2023

## Exhibit D, Page 2 of 2

6/21/2023  
9:04 AMSchweet Linde & Rosenblum, PLLC  
Slip Listing

Page 2

Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
553438	Michael	0.20	450.00	90.00
2/10/2023	Time	0.00	T	
Billed	G:20145162 3/6/2023 BurdetteVirginia.Eyman			
Call from S. Edison regarding status of asset administration and claim issues.				
553953	Tom	0.05	450.00	22.50
2/15/2023	Time	0.00	T	
Billed	G:20145162 3/6/2023 BurdetteVirginia.Eyman			
Conference to office of Virginia Burdette [REDACTED]				
559716	Tom	0.25	450.00	112.50
4/5/2023	Time	0.00	T	
Billed	G:20146542 5/4/2023 BurdetteVirginia.Eyman			
Conference with M. Sperry regarding [REDACTED]				
559992	Michael	0.90	450.00	405.00
4/5/2023	Time	0.00	T	
Billed	G:20146542 5/4/2023 BurdetteVirginia.Eyman			
Review of correspondence with L. Feisntein regarding domain ownership and review of research regarding same (.5) email to VAB [REDACTED]				
[REDACTED] (.4)				
Grand Total	Billable	2.70		1215.00
	Unbillable	0.00		0.00
	Total	2.70		1215.00